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July 10, 2017

Ms. Mary D. Nichols Chairperson, California Air Resources Board 1001 "I" Street Sacramento, CA 95814

RE: VW Settlement and Disadvantaged Communities

Dear Ms. Nichols and Board Members:

It is our understanding that the Air Resources Board (CARB) is soon to consider the investment plan of Electrify America to satisfy the consent decree for air quality standards violations related to VW vehicles and that the Zero Net Energy Community project for the City of Carson is a possible recipient location of these funds. As such, the South Bay Cities Council of Governments' (SBCCOG) expresses its strong support to this Electrify America plan that will both meet its obligations while contributing to the support of the City of Carson's efforts to succeed as a Zero Net Energy Community.

The SBCCOG works with our member cities' in their efforts to find innovative and sustainable projects that will help our cities meet their environmental goals. We are currently preparing a Climate Action Plan for the City of Carson. This project provides an opportunity to leverage the goals of the VW settlement with Carson's sustainability efforts through funding of the Zero Net Energy Community project. It will benefit not only Carson but also our entire subregion.

Electrify America has previously recognized the specific value of an electric vehicle charging infrastructure project in the City of Carson, California in its most recent submission to CARB. Moreover, according to US Census data, Carson is one of the most ethnically diverse cities in the United States (Latino: 37%, Asian: 26%, African American: 24%, White: 24%) with a high percentage of low-income, disadvantaged families. In addition, according to the CalEnviroScreen 3.0, the City has the poorest air-quality scores in the State of California https://oehha.ca.gov/calenviroscreen/sb535) and adjoins refineries, chemical manufacturing facilities, and other major sources of air pollution. Finally, the City of Carson lies in a critical transportation crossroads for our subregion where charging options are essential to foster greater adoption of EVs for use by adjacent city travelers as well as those on the I405, I110, I710, and 91 freeways as well as major East-West surface streets.

The EV charging infrastructure proposal for Electrify America in the Carson community/Charge Bliss project satisfies the following explicit requirements of the consent decree:

- 1. Create another "Green" City.
- 2. Provide services to "citizens who live primarily in disadvantaged communities."
- 3. Foster adoption of zero emission vehicles in a disadvantaged community.
- 4. Address comprehensive State air quality goals.

Furthermore, we support the overall goals of the Charge Bliss/CEC project to offset all energy usage with co-located renewable generation, mitigate peak load through battery storage, create efficiencies with LED lighting and new mechanical systems, and to actively manage the EV charging infrastructure through cutting-edge control systems designed by the UCLA group. The alliance of the City of Carson, South Bay Cities Council of Governments, Charge Bliss, and many other key stakeholders makes the prospect of overall project success very high. This will be bolstered substantially by Electrify America's commitment to project participation and, specifically, funding of EV infrastructure design, engineering, construction, and operation.

We strongly support CARB in approving the Electrify America plan. This will bring significant improvement to air quality, health, and welfare of the citizens of this disadvantaged community, increase the adoption of zero emission vehicles, engage students in Science, Technology, Engineering, and Medical (STEM) fields, and significantly improve EV charging infrastructure at key locations including major transportation routes and multi-unit dwellings.

We therefore urge the Air Resources Board to expedite the process for Electrify America to formalize and begin their contribution to critical EV infrastructure in disadvantaged communities. We firmly believe this demonstration of a Zero Net Energy Community in the City of Carson juxtaposed with comprehensive zero emission vehicle infrastructure will both meet the consent decree requirements and lead to recognition of the value of comprehensive "green" energy projects for disadvantaged communities.

Thank you for your time and consideration.

Sincerely,

Kurt Weideman, SBCCOG Chair Mayor Pro Tem, City of Torrance